

TITLE V MINOR MODIFICATION (without construction) APPLICATION REVIEW

Facility Name: **Kraton Chemical, LLC**

City: Savannah

County: Chatham

AIRS #: 04-13-051-00148

Application #: 703325

Date Title V Application Received: November 4, 2022

Permit No: 2821-051-0148-V-04-3

Program	Review Engineers	Review Managers
SSPP	Anna Gray	Heather Brown
SSCP	Vincent Jenkins	Daniel Slade
ISMU	N/A	N/A
TOXICS	N/A	N/A
Permitting Program Manager		Stephen Damaske

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft/proposed operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the proposed permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
2821-051-0148-V-04-0	July 8, 2019	Title V Renewal
2821-051-0148-V-04-1	December 11, 2019	Installation of a crude tall oil process
2821-051-0148-V-04-2	June 29, 2020	Revision of Permit Condition 6.1.7.cii to allow pH value to go higher than 12.

B. Regulatory Status

1. PSD/NSR/RACT

The Title I site major source threshold for any *regulated NSR pollutant* is 100 tons per year because Kraton Chemical, LLC's ("Kraton") operation can be classified as one of the 28 listed source categories in 40 CFR 52.21(b). The Title I site in question includes Kraton and not Arboris, LLC or International Paper. Kraton is classified as an existing major stationary source under PSD/NSR because potential emissions of volatile organic compounds (VOCs) exceeds 100 tons per year.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓		✓	
Total HAPs	✓		✓	

II. Proposed Modification

A. Description of Modification

Kraton Chemical, LLC (Kraton) is requesting modification of Permit Condition 6.1.7.c.iii in Permit No. 2821-051-0148-V-04-0 regarding the description of an excursion for baghouse CE03. Per this condition, an excursion is defined as, “Any recorded pressure drop across baghouse CE03 that is less than 0.20 inches of water or greater than 10.0 inches of water or the most recent value approved by the Division.” Per the manufacturer's guarantee for the new baghouse, it demonstrates a 99.99 percent control efficiency at an operating range of 0.20 inches of water to 40.0 inches of water. As such, Kraton requests permit condition 6.1.7.c.iii be modified to reflect this range. This is the only permit condition affected by this change. The baghouse replacement was approved via off-permit in August 2021.

B. Emissions Change

There is no expected change in emissions as a result of this modification.

C. PSD/NSR Applicability

The modification is not subject to PSD or NSR and is not a modification under NSPS or NESHAP.

III. Facility Wide Requirements

Not applicable.

IV. Regulated Equipment Requirements

Baghouse is used to comply with rules (b) and (e) for the Flaker equipment (EU ID No. 131).

V. Testing Requirements (with Associated Record Keeping and Reporting)

Not applicable.

VI. Monitoring Requirements (with Associated Record Keeping and Reporting)

Not applicable,

VII. Other Record Keeping and Reporting Requirements

Condition 6.1.7.c.ii was revised as requested.

VIII. Specific Requirements

Not applicable.

Addendum to Narrative

The 45-day EPA review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//